

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Promoting Telehealth	)	WC Docket No. 02-60
In Rural America	)	

**PETITION FOR CLARIFICATION**

TeleQuality Communications, LLC (TeleQuality) respectfully requests that the Wireline Competition Bureau clarify two aspects of its recent Public Notice regarding the determination of rural rates in the Rural Health Care (RHC) Program for Funding Year 2019.<sup>1</sup> First, TeleQuality asks the Bureau to clarify that a service provider using the third method of determining rural rates described in the *Public Notice* need not submit its rates to the Federal Communications Commission (Commission) or the relevant state commission before it responds to a rural health care provider’s (HCP’s) request for bids. Second, TeleQuality asks the Bureau to clarify what kind of documentation will satisfy the “publicly available rates” requirement.

**I. The Bureau Should Clarify That Service Providers Need Not Submit Their Method 3 Rural Rates to the Commission or a State Commission Before Submitting a Bid**

The *Public Notice* provides additional guidance on the three methods of determining rural rates described in the Commission’s rules.<sup>2</sup> The *Public Notice* also states that “[a] service provider should determine the rural rate *before* it responds to a health care provider’s request for

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<sup>1</sup> *The Wireline Competition Bureau Provides Guidance Regarding the Commission’s Rules for Determining Rural Rates in the Rural Health Care Telecommunications Program*, Public Notice, WC Docket No. 02-60, DA 19-92 (rel. Feb. 15, 2019) (*Public Notice*).

<sup>2</sup> 47 C.F.R. § 54.607.

bids (FCC Form 465) and ensure that the rate is sufficiently documented at that time.”<sup>3</sup> The service provider can and must determine its rural rate before it responds to an HCP’s request for bids. It is unclear, however, whether the Bureau, in directing service providers to “ensure that the rate is sufficiently documented at that time,” means that service providers must submit their rural rates for approval to the Commission or the state commission prior to submitting a bid.

TeleQuality respectfully asks the Bureau to clarify that these statements should not be interpreted to impose a requirement for vendors using Method 3 to submit the rural rate for approval to the relevant regulatory body before a bid is submitted.<sup>4</sup> The Commission has not previously stated that service providers using Method 3 must submit rates to the Commission or a state commission before submitting bids. Because such a requirement would be onerous and time consuming at best, and impossible at worst, TeleQuality asks the Bureau to clarify that it did not in fact intend to impose a new timing requirement.

Method 3 allows service providers to seek approval of cost-based rural rates from the Commission or a state commission, depending on whether the services are interstate or intrastate.<sup>5</sup> Although a provider may use Method 3 only if it is unable to determine a rural rate using Methods 1 and 2, as a practical matter a provider such as TeleQuality—which does not serve non-HCPs and has found it challenging to identify publicly available rates for similar

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<sup>3</sup> *Public Notice* at 2.

<sup>4</sup> If the Bureau reaches a different conclusion, TeleQuality requests a waiver of the requirement for FY 2019, especially given that the *Public Notice* was released after the beginning of the funding window and applicants had already started their competitive bidding processes.

<sup>5</sup> *Id.* at 3.

services to rural HCP locations—is likely to use Method 3 for a significant portion of its rural rates.<sup>6</sup>

TeleQuality asks the Bureau to clarify this requirement for two main reasons. First, a service provider does not know at the bidding stage whether new circuits will be used for interstate or intrastate services, as HCPs do not specify the regulatory classification of the telecommunications service in their requests for bids. Without knowing whether it will be providing interstate or intrastate services (or both), a service provider does not know which entity to seek approval from: the Commission, or the relevant state commission. To be on the safe side, service providers would have to seek approval from *both* the FCC and state commissions for all rates they bid, which would waste company and regulatory administrative resources and may even make it impossible for a service provider to submit a bid by the due date.<sup>7</sup> Further, a service provider may be required to resubmit the state or federal filing multiple times within a few months, depending upon the number of bids it is submitting within a given state, which may create even more additional work for state and federal regulators. It is thus unreasonable to require a service provider to obtain regulatory approval for rural rates before submitting bids.

Second, such a filing with a state commission or the Commission just prior to a service provider responding to a bid request is anti-competitive. TQ is a company that exclusively serves HCPs. Any public filing it makes will identify for its competitors the rates it intends to bid in advance of that bid.

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<sup>6</sup> Alaska Communications explained this well in its comments on the *Public Notice*. Letter from Karen Brinkmann, Counsel for Alaska Communications, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos 02-60, 17-310, at 2 (filed Mar. 13, 2019).

<sup>7</sup> Alaska Communications described the delays it has faced in getting rates approved by the Alaska Commission. *See id.*

Finally, requiring a service provider to obtain regulatory approval before submitting bids also wastes resources because the service provider may not win the contract. If a service provider's bid does not win, both the service provider and the regulator(s) that had to examine and approve the proposed rates will have wasted time and manpower in a process that ultimately was unnecessary.

It is perfectly reasonable to require service providers to establish rates and identify the relevant documentation before submitting bids if they are using Methods 1 or 2. But if they are using Method 3, this requirement will lead to administrative waste and unnecessary delays at best, and at worst will undermine the competitive bidding process by preventing service providers from submitting bids on time. TeleQuality thus asks the Bureau to clarify that service providers using Method 3 need not submit the rural rate for approval before filing bids, but rather before the rural HCP files an application for RHC funding.

## **II. The Bureau Should Clarify What Documentation Satisfies the “Publicly Available Rates” Requirement**

When service providers use Method 2 under the Commission's rules to determine their rural rates, they must use other carriers' tariffed or “other publicly available rates.”<sup>8</sup> Similarly, the RHC program requires applicants to identify this comparable urban rate for the services they are purchasing using a tariffed or “publicly-available rate.”<sup>9</sup> In the *Public Notice*, the Bureau noted that applicants must provide documentation with their applications substantiating the rural and urban rates.<sup>10</sup> TeleQuality respectfully asks that the Bureau clarify its explanation of what

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<sup>8</sup> 47 C.F.R. § 54.607(b).

<sup>9</sup> 47 C.F.R. § 54.605(a).

<sup>10</sup> *Public Notice* at 3.

qualifies as the “publicly available” documentation used to substantiate both the rural and urban rates.

Method 2 requires service providers to identify tariffed and other publicly available rates charged by other service providers for similar services.<sup>11</sup> The *Public Notice* explains that “[p]ublicly available rates include, but are not limited to, those posted on a rate card on a service provider’s website or accessible via a public database.”<sup>12</sup> As an example of a public database, the *Public Notice* describes the E-rate Open Data Platform, and “encourage[s] participants to use this tool to familiarize themselves with potential service options in their rural areas.”<sup>13</sup> The definition of “publicly available” was included in the *Public Notice* in the context of calculating the Method 2 rural rate, but the same phrase is used by the Commission in the urban rate rule as well. The Commission would presumably use the same definition for both rules.

Unfortunately, it appears to be extremely difficult to provide supporting documentation of publicly available rates that meet with USAC’s satisfaction, even using the resources the Bureau specifically identifies.<sup>14</sup> Just last week, USAC rejected TeleQuality’s attempt to document urban rates using the E-rate Open Data Platform.<sup>15</sup> In its rejection, USAC explained that “[t]hough this rate can be viewed on our website, this rate was privately negotiated and is a

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<sup>11</sup> *Public Notice* at 2.

<sup>12</sup> *Id.* at 4.

<sup>13</sup> *Id.*

<sup>14</sup> We note that the Bureau stated its guidance was for FY 2019, but USAC appears to be applying it to FY 2018 existing requests as well. To the extent some of the Bureau’s guidance is being announced for the first time in the *Public Notice*, applicants and service providers were not given notice of the new standards.

<sup>15</sup> When the Commission directed USAC to develop the E-rate open database, the intent was to provide “greater visibility into pricing and technology choices for their peers. . .” *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Order and Further Notice of Proposed Rulemaking, 29 FCC Rcd 8870 at ¶ 158 (2014) (*July 2014 Modernization Order*).

contracted rate between the school(s) listed and their service provider. This rate is available for public inspection and viewing but is not available to the public, it is only available to the school listed.”<sup>16</sup> The purpose of providing documentation of urban rates is to identify rates that are available to urban HCPs. Those rates available to urban HCPs are then supposed to be the rates that rural HCPs pay, so they have access to the same telecommunications services at comparable rates to those purchased by their urban counterparts. It is unclear why USAC believes that urban HCPs would not be able to negotiate for a similar rate as those received by schools and libraries in an urban area or why those rates would not be available to other customers in those urban markets. The competitively bid rates in the E-rate database reflect the pre-discount, i.e., the total cost of the service. Further, the E-rate database provides a way for USAC to validate rates that are being charged in those urban areas.

TeleQuality submitted publicly available urban rates in a formal list from two service providers, Lumos and Nitel, explaining that although their rates were not posted on their web sites, they were readily available by calling the providers. TeleQuality provided the contact information for Lumos and Nitel so that USAC can validate the rates.<sup>17</sup> USAC rejected these as well, because the rates were not posted on the providers’ websites.<sup>18</sup> Today’s unregulated industry makes this requirement unworkable. Determining whether rates are “publicly available” by defining that they are listed on a service provider’s website misses the fact that in an unregulated environment, service providers would not want to provide a list of their rates, only to

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<sup>16</sup> Exhibit 1, Email from USAC to TeleQuality, Mar. 13, 2019. TeleQuality notes that the E-rate Open Data Platform is not a good source for rural rates because it does not include distance, making it much more challenging to compare services.

<sup>17</sup> Exhibit 2, Nitel rate sheet, and Exhibit 3, Lumos rate sheet, with letter from Lumos attesting to validity of publicly available rates.

<sup>18</sup> Exhibit 4, Email Exchange Between TeleQuality and USAC, Mar. 13, 2019; Exhibit 5, information request from RHC to David Wagner, representative of FMCH Gloster Clinic, dated Feb. 26, 2019.

have their competitors undercut their pricing. The *Public Notice*, which stated it was providing guidance for FY 2019, was the first time that the Commission announced that comparable urban rates had to be published on a website. USAC, therefore, should not require publicly available rates to be published on a website for FY 2018.

In short, TeleQuality tried to use these three different sources of publicly available rates to justify urban rates, and none of them passed USAC's scrutiny. TeleQuality has no reason to believe that USAC will be any more receptive with respect to rural rates without guidance from the Commission as requested in this clarification request.

The only sources USAC has not questioned are tariffs, even though the rules allow "tariffs and other publicly available" rates. There must be some publicly available rate outside of a tariff that HCPs and service providers should be allowed to use to satisfy the rule. Numerous carriers are providing services at these bandwidths in urban areas. However, most of those carriers have rescinded tariffs for Ethernet and similar higher broadband services, which comprise a large portion of the services TeleQuality delivers. This issue drives applicants and vendors to search for publicly available rates from applicable carriers more than ever before.

More generally, TeleQuality respectfully asks the Bureau to consider that tariffs do not necessarily reflect the realities of the marketplace. DS3s still appear in tariffs, for example, even though no customer would choose a DS3 over fiber where both were available because DS3s can be up to 10 times more expensive.

The rate identified for use as the urban rate can determine whether the rural HCP can afford the telecommunications service necessary to provide health care. In the Telecommunications Act of 1996, Congress mandated that the rates for services provided to rural HCPs be "reasonably comparable to rates charged for similar services in urban areas" in the

same state.<sup>19</sup> Urban rates do not satisfy the statutory requirement of reasonably comparable rates when they do not reflect market realities, and rural HCPs are paying significantly more than their urban HCP peers for the same bandwidth service.

For these reasons, it is extremely difficult for a service provider to satisfy the criteria of a publicly available rate for both Method 2 and urban rates. TeleQuality respectfully requests the Bureau clarify how service providers may meet the “publicly available rates” standard, keeping in mind the purpose of the RHC program—to ensure rural health care providers are paying a comparable price for telecommunications services as their urban counterparts. As evidenced by the fact that USAC accepted other forms of documentation until FY 2018,<sup>20</sup> the Commission has the authority to accept a wider variety of documentation that satisfies the statutory goal of the program, while still ensuring that USAC can validate its authenticity.

Respectfully submitted,



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*Counsel for TeleQuality Communications, LLC*

March 18, 2019

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<sup>19</sup> 47 U.S.C. § 254(h)(1).

<sup>20</sup> The Commission noted in its January 2018 Notice of Apparent Liability that acceptable urban rate documentation may include “tariff pages, contracts, signed letters on a service provider’s letterhead, rate pricing information from a service provider’s website, or similar documentation showing how the urban rate was obtained, and the date on the urban rate documentation should indicate that the rate is provided in the current funding year.” *DataConnex, LLC*, Notice of Apparent Liability for Forfeiture and Order, 33 FCC Rcd 1575 (January 30, 2018).



## **EXHIBIT 1**

**From:** [Theresa Schrader](#)  
**To:** [Theresa Schrader](#)  
**Subject:** FW: Urban Rate Responses  
**Date:** Monday, March 18, 2019 7:38:25 PM

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**From:** Jason Whipkey <[jason.whipkey@cbhealthwv.org](mailto:jason.whipkey@cbhealthwv.org)>  
**Sent:** Wednesday, March 13, 2019 10:46 AM  
**To:** Debbi Robinson <[Debbi@teleguality.com](mailto:Debbi@teleguality.com)>  
**Subject:** Urban Rate Responses

Blacksville:

Urban Rate Documentation FRN: 1835079 Thank you for your response. The new document you have submitted is not acceptable. Though this rate can be viewed on our website, this rate was privately negotiated and is a contracted rate between the school(s) listed and their service provider. This rate is available for public inspection and viewing but is not available to the public, it is only available to the school listed. Please allow me to use the Frontier tariff rate of \$1180 from the original pdf as the urban rate for this FRN or provide additional documentation to support the urban rate. A response is required. Responses not received by the request deadline days will result in a denial of this funding request. For questions or assistance about this information request, contact Kai Thompson at [kai.thompson@usac.org](mailto:kai.thompson@usac.org).

Burton:

Urban Rate Documentation FRN: 1835084 Thank you for your response. The new document you have submitted is not acceptable. Though this rate can be viewed on our website, this rate was privately negotiated and is a contracted rate between the school listed and their service provider. This rate is available for public inspection and viewing but is not available to the public, it is only available to the school listed. Please allow me to use the Frontier tariff rate of \$1180 from the original supporting pdf as the urban rate for this FRN or provide additional documentation to support the urban rate. A response is required. Responses not received by the request deadline will result in a denial of this funding request. For questions or assistance about this information request, contact Kai Thompson at [kai.thompson@usac.org](mailto:kai.thompson@usac.org).

## **EXHIBIT 2**



RFQ# 7187211142

Telecom Service Quote For  
William Anderwald  
Telequality Communications  
Office: 2104080388  
5362 LEMEE LN, MARIPOSA, CA, 95338  
Email: willaim@telequality.com

Prepared and Presented by  
Maria Zehren  
Account Relations Manager  
Office: 773-364-3134  
Email: mzehren@nitelusa.com

\*\*The attached rates are  
publicly available retail rates  
as of September 26, 2018 at  
12:30PM, CST. The rates  
provided are available to all  
Nitel retail customers.

Service Location	MPLS				Term	Monthly (\$)	Install (\$)
	Access bandwidth	Port (Mbps)	Router				
Loc 8: 1802 6TH AVE S, BIRMINGHAM, AL, 35233	10M FastE	10	No		36	542.36	0.00
Loc 8: 1802 6TH AVE S, BIRMINGHAM, AL, 35233	20M FastE	20	No		36	664.81	500.00
Loc 8: 1802 6TH AVE S, BIRMINGHAM, AL, 35233	50M FastE	50	No		36	741.17	0.00
Loc 8: 1802 6TH AVE S, BIRMINGHAM, AL, 35233	100M FastE	100	No		36	827.53	0.00
Loc 8: 1802 6TH AVE S, BIRMINGHAM, AL, 35233	300M GigE	300	No		36	1,333.31	0.00
Loc 8: 1802 6TH AVE S, BIRMINGHAM, AL, 35233	500M GigE	500	No		36	1,411.46	0.00
Loc 8: 1802 6TH AVE S, BIRMINGHAM, AL, 35233	1000M GigE	1000	No		36	1,834.01	0.00
Loc 9: 4301 W MARKHAM ST, LITTLE ROCK, AR, 72205	10M FastE	10	No		36	539.23	0.00
Loc 9: 4301 W MARKHAM ST, LITTLE ROCK, AR, 72205	20M FastE	20	No		36	653.32	0.00
Loc 9: 4301 W MARKHAM ST, LITTLE ROCK, AR, 72205	50M FastE	50	No		36	741.17	0.00
Loc 9: 4301 W MARKHAM ST, LITTLE ROCK, AR, 72205	100M FastE	100	No		36	827.53	0.00
Loc 9: 4301 W MARKHAM ST, LITTLE ROCK, AR, 72205	300M GigE	300	No		36	1,333.31	0.00
Loc 9: 4301 W MARKHAM ST, LITTLE ROCK, AR, 72205	500M GigE	500	No		36	1,411.46	0.00
Loc 9: 4301 W MARKHAM ST, LITTLE ROCK, AR, 72205	1000M GigE	1000	No		36	1,834.01	0.00
Loc 10: 530 S JACKSON ST, LOUISVILLE, KY, 40202	10M FastE	10	No		36	542.36	0.00
Loc 10: 530 S JACKSON ST, LOUISVILLE, KY, 40202	20M FastE	20	No		36	658.01	500.00
Loc 10: 530 S JACKSON ST, LOUISVILLE, KY, 40202	50M FastE	50	No		36	741.17	0.00
Loc 10: 530 S JACKSON ST, LOUISVILLE, KY, 40202	100M FastE	100	No		36	827.53	0.00
Loc 10: 530 S JACKSON ST, LOUISVILLE, KY, 40202	300M GigE	300	No		36	1,333.31	0.00
Loc 10: 530 S JACKSON ST, LOUISVILLE, KY, 40202	500M GigE	500	No		36	1,411.46	0.00
Loc 10: 530 S JACKSON ST, LOUISVILLE, KY, 40202	1000M GigE	1000	No		36	1,834.01	0.00
Loc 11: 1225 N STATE ST, JACKSON, MS, 39202	10M FastE	10	No		36	512.66	0.00
Loc 11: 1225 N STATE ST, JACKSON, MS, 39202	20M FastE	20	No		36	664.81	500.00
Loc 11: 1225 N STATE ST, JACKSON, MS, 39202	50M FastE	50	No		36	682.24	0.00
Loc 11: 1225 N STATE ST, JACKSON, MS, 39202	100M FastE	100	No		36	827.53	0.00
Loc 11: 1225 N STATE ST, JACKSON, MS, 39202	300M GigE	300	No		36	1,061.27	0.00
Loc 11: 1225 N STATE ST, JACKSON, MS, 39202	500M GigE	500	No		36	1,205.07	0.00
Loc 11: 1225 N STATE ST, JACKSON, MS, 39202	1000M GigE	1000	No		36	1,834.01	0.00
Loc 12: 1211 MEDICAL CENTER DR, NASHVILLE, TN, 37232	10M FastE	10	No		36	542.36	0.00
Loc 12: 1211 MEDICAL CENTER DR, NASHVILLE, TN, 37232	20M FastE	20	No		36	594.88	0.00
Loc 12: 1211 MEDICAL CENTER DR, NASHVILLE, TN, 37232	50M FastE	50	No		36	696.31	500.00
Loc 12: 1211 MEDICAL CENTER DR, NASHVILLE, TN, 37232	100M FastE	100	No		36	715.85	500.00
Loc 12: 1211 MEDICAL CENTER DR, NASHVILLE, TN, 37232	300M GigE	300	No		36	945.61	0.00
Loc 12: 1211 MEDICAL CENTER DR, NASHVILLE, TN, 37232	500M GigE	500	No		36	1,125.36	0.00
Loc 12: 1211 MEDICAL CENTER DR, NASHVILLE, TN, 37232	1000M GigE	1000	No		36	1,645.83	0.00
Loc 13: 800 PENNSYLVANIA AVE, CHARLESTON, WV, 25302	10M FastE	10	No		36	617.39	210.00
Loc 13: 800 PENNSYLVANIA AVE, CHARLESTON, WV, 25302	20M FastE	20	No		36	746.32	0.00
Loc 13: 800 PENNSYLVANIA AVE, CHARLESTON, WV, 25302	50M FastE	50	No		36	840.11	0.00
Loc 13: 800 PENNSYLVANIA AVE, CHARLESTON, WV, 25302	100M FastE	100	No		36	898.72	0.00
Loc 13: 800 PENNSYLVANIA AVE, CHARLESTON, WV, 25302	300M GigE	300	No		36	1,641.16	210.00
Loc 13: 800 PENNSYLVANIA AVE, CHARLESTON, WV, 25302	500M GigE	500	No		36	1,953.76	210.00
Loc 13: 800 PENNSYLVANIA AVE, CHARLESTON, WV, 25302	1000M GigE	1000	No		36	2,657.10	210.00
Loc 14: 2301 N LAKE DR, MILWAUKEE, WI, 53211	10M FastE	10	No		36	542.36	0.00
Loc 14: 2301 N LAKE DR, MILWAUKEE, WI, 53211	20M FastE	20	No		36	658.01	500.00
Loc 14: 2301 N LAKE DR, MILWAUKEE, WI, 53211	50M FastE	50	No		36	741.17	0.00
Loc 14: 2301 N LAKE DR, MILWAUKEE, WI, 53211	100M FastE	100	No		36	827.53	0.00
Loc 14: 2301 N LAKE DR, MILWAUKEE, WI, 53211	300M GigE	300	No		36	1,333.31	0.00
Loc 14: 2301 N LAKE DR, MILWAUKEE, WI, 53211	500M GigE	500	No		36	1,411.46	0.00
Loc 14: 2301 N LAKE DR, MILWAUKEE, WI, 53211	1000M GigE	1000	No		36	1,834.01	0.00

## **EXHIBIT 3**



One Lumos Plaza  
Waynesboro, VA 22980

March 13, 2019

Universal Service Administration Co  
700 12<sup>th</sup> Street NW, Suite 900  
Washington, D.C. 20005

**Re: Urban Ethernet Rates in Charleston, WV and Richmond, VA, on behalf of customer/service provider Telequality Communications**

To Whom It May Concern:

This letter is to confirm the urban enterprise customer rates for Ethernet services in Charleston, WV and/or Richmond, VA that were given previously to USAC in June 2018. These remain the current rates for Lumos Networks dba Segra customers in these two areas.

If you have any questions, please feel free to contact me at [Jim.Shannon@Segra.com](mailto:Jim.Shannon@Segra.com).

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Jim Shannon".

Jim Shannon  
Director, Product Management

Cc: Justin Volker, Telequality Communications: [Justin@telequality.com](mailto:Justin@telequality.com)

Lumos Network Ethernet Port list pricing 6-27-2018

Row Labels	1 Year	2 Year	3 Year	5 Year
2Mbps	\$ 160.00	\$ 80.00	\$ 53.00	\$ 47.60
3Mbps	\$ 240.00	\$ 120.00	\$ 80.00	\$ 72.00
5Mbps	\$ 271.20	\$ 136.00	\$ 90.40	\$ 81.60
6Mbps	\$ 271.20	\$ 136.00	\$ 90.40	\$ 81.60
10Mbps	\$ 360.00	\$ 180.00	\$ 120.00	\$ 108.00
20Mbps	\$ 612.00	\$ 306.00	\$ 204.00	\$ 184.00
30Mbps	\$ 848.40	\$ 424.40	\$ 282.80	\$ 254.40
40Mbps	\$ 1,090.40	\$ 545.20	\$ 364.00	\$ 327.20
50Mbps	\$ 1,332.00	\$ 666.00	\$ 444.00	\$ 399.60
60Mbps	\$ 1,570.00	\$ 786.00	\$ 524.00	\$ 471.60
70Mbps	\$ 1,808.00	\$ 904.00	\$ 604.00	\$ 542.80
80Mbps	\$ 2,046.00	\$ 1,024.00	\$ 682.00	\$ 614.00
90Mbps	\$ 2,284.00	\$ 1,142.00	\$ 762.00	\$ 685.20
100Mbps	\$ 2,520.00	\$ 1,260.00	\$ 840.00	\$ 756.00
150Mbps	\$ 2,722.80	\$ 1,361.40	\$ 907.60	\$ 817.00
200Mbps	\$ 2,925.60	\$ 1,462.80	\$ 975.20	\$ 878.00
250Mbps	\$ 3,128.40	\$ 1,564.20	\$ 1,042.80	\$ 939.00
300Mbps	\$ 3,331.20	\$ 1,665.60	\$ 1,110.40	\$ 1,000.00
350Mbps	\$ 3,530.80	\$ 1,765.40	\$ 1,177.20	\$ 1,059.60
400Mbps	\$ 3,730.40	\$ 1,865.20	\$ 1,244.00	\$ 1,119.20
450Mbps	\$ 3,929.80	\$ 1,964.80	\$ 1,310.20	\$ 1,179.00
500Mbps	\$ 4,129.20	\$ 2,064.40	\$ 1,376.40	\$ 1,238.80
550Mbps	\$ 4,328.60	\$ 2,164.40	\$ 1,443.00	\$ 1,298.80
600Mbps	\$ 4,528.00	\$ 2,264.40	\$ 1,509.60	\$ 1,358.80
650Mbps	\$ 4,727.00	\$ 2,364.20	\$ 1,576.00	\$ 1,418.80
700Mbps	\$ 4,926.00	\$ 2,464.00	\$ 1,642.40	\$ 1,478.80
750Mbps	\$ 5,125.00	\$ 2,563.20	\$ 1,708.80	\$ 1,538.40
800Mbps	\$ 5,324.00	\$ 2,662.40	\$ 1,775.20	\$ 1,598.00
850Mbps	\$ 5,523.00	\$ 2,762.20	\$ 1,841.60	\$ 1,658.00
900Mbps	\$ 5,722.00	\$ 2,862.00	\$ 1,908.00	\$ 1,718.00
950Mbps	\$ 5,921.00	\$ 2,961.00	\$ 1,974.00	\$ 1,777.00
1Gbps	\$ 6,120.00	\$ 3,060.00	\$ 2,040.00	\$ 1,836.00
2Gbps	\$ 6,248.40	\$ 3,124.40	\$ 2,082.80	\$ 1,874.40
3Gbps	\$ 6,372.00	\$ 3,186.00	\$ 2,124.00	\$ 1,911.60
4Gbps	\$ 6,490.40	\$ 3,245.20	\$ 2,164.00	\$ 1,947.20
5Gbps	\$ 6,608.40	\$ 3,304.40	\$ 2,202.80	\$ 1,982.40
6Gbps	\$ 6,727.60	\$ 3,364.40	\$ 2,242.80	\$ 2,018.80
7Gbps	\$ 6,845.60	\$ 3,424.00	\$ 2,282.80	\$ 2,054.40
8Gbps	\$ 6,964.00	\$ 3,482.40	\$ 2,322.00	\$ 2,089.60
9Gbps	\$ 7,082.00	\$ 3,542.00	\$ 2,362.00	\$ 2,125.20
10Gbps	\$ 7,200.00	\$ 3,600.00	\$ 2,400.00	\$ 2,160.00

Lumos On-Net Building List - Charleston and Richmond - June 25, 2018

ADDRESS	CITY	STATE	ZIP	LATITUDE	LONGITUDE
5342 BIG TYLER RD	CHARLESTON	WV	25313	38.431944	-81.774722
1 CANTLEY DR	CHARLESTON	WV	25314	38.346602	-81.653603
1 CLAY SQ	CHARLESTON	WV	25301	38.348731	-81.629675
1 CREATIVE PL	CHARLESTON	WV	25311	38.359024	-81.600109
1 HILLCREST DR E	CHARLESTON	WV	25311	38.339113	-81.604719
1 KENTON DR	CHARLESTON	WV	25311	38.35287	-81.604484
1 UNITED WAY SQ	CHARLESTON	WV	25301	38.354945	-81.62896
1 VIRGINIA ST W	CHARLESTON	WV	25302	38.356119	-81.644221
100 ASSOCIATION DR	CHARLESTON	WV	25311	38.354333	-81.608263
100 KANAWHA BLVD E	CHARLESTON	WV	25302	38.351944	-81.641388
100 TRACY WAY	CHARLESTON	WV	25302	38.358785	-81.599734
1001 LEE ST E	CHARLESTON	WV	25301	38.349651	-81.632535
1001 SMITH ST	CHARLESTON	WV	25301	38.351859	-81.627846
1001 VIRGINIA ST E	CHARLESTON	WV	25375	38.347622	-81.634018
1007 BULLITT ST	CHARLESTON	WV	25301	38.357111	-81.628563
1009 BULLITT ST	CHARLESTON	WV	25301	38.357481	-81.627987
101 WASHINGTON ST E	CHARLESTON	WV	26301	38.356667	-81.638611
1012 KANAWHA BLVD E	CHARLESTON	WV	25301	38.346741	-81.635183
1031 QUARRIER ST	CHARLESTON	WV	25301	38.350277	-81.634163
1033 QUARRIER ST	CHARLESTON	WV	25301	38.347806	-81.632618
1033 VIRGINIA ST E	CHARLESTON	WV	25301	38.346919	-81.633419
109 CAPITOL ST	CHARLESTON	WV	25301	38.349618	-81.635543
1095 FLEDDERJOHN RD	CHARLESTON	WV	25314	38.342045	-81.676843
110 WYOMING ST	CHARLESTON	WV	25302	38.358913	-81.643833
1100 SCIENCE PARK DR	CHARLESTON	WV	25303	38.35592	-81.70529
111 COLUMBIA AVE	CHARLESTON	WV	25302	38.356034	-81.644526
112 AIRPORT RD	CHARLESTON	WV	25311	38.36786	-81.595247
112 CAPITOL ST	CHARLESTON	WV	25301	38.349501	-81.635596
117 1ST AVE	CHARLESTON	WV	25303	38.362307	-81.695924
1201 GREENBRIER ST	CHARLESTON	WV	25311	38.359166	-81.59302
122 HILLS PLZ	CHARLESTON	WV	25312	38.367272	-81.668109
1223 E WASHINGTON ST	CHARLESTON	WV	25301	38.34663	-81.627251
123 CAPITOL ST	CHARLESTON	WV	25301	38.349618	-81.635543
124 LAKEVIEW DR	CHARLESTON	WV	25313	38.412882	-81.803003
1251 BARLOW DR	CHARLESTON	WV	25311	38.376296	-81.600739
1301 PIEDMONT RD	CHARLESTON	WV	25301	38.350682	-81.621344
1340 SMITH ST	CHARLESTON	WV	25301	38.347257	-81.621153
135 SUMMERS ST	CHARLESTON	WV	25301	38.350923	-81.6353
1500 GREENBRIER ST	CHARLESTON	WV	25301	38.36858	-81.579537
1506 KANAWHA BLVD W	CHARLESTON	WV	25302	38.365437	-81.664929
1537 4TH AVE	CHARLESTON	WV	25387	38.368286	-81.663498
160 SPRING ST	CHARLESTON	WV	25301	38.35781	-81.627371
1600 PENNSYLVANIA AVE	CHARLESTON	WV	25302	38.361264	-81.61982
1601 2ND AVE	CHARLESTON	WV	25301	38.367585	-81.665902
1615 WASHINGTON ST E	CHARLESTON	WV	25305	38.340217	-81.616024
1700 MACCORKLE AVE SE	CHARLESTON	WV	25314	38.335408	-81.624942



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1710 PENNSYLVANIA AVE	CHARLESTON	WV	25301	38.361985	-81.617761
1740 COONSKIN DR	CHARLESTON	WV	25311	38.375012	-81.584491
181 SUMMERS ST	CHARLESTON	WV	25301	38.351498	-81.634368
18B KEYSTONE DR	CHARLESTON	WV	25311	38.36681	-81.607632
190 DRY BRANCH RD	CHARLESTON	WV	25306	38.319286	-81.556362
1900 KANAWHA BLVD E @ (BLDG 1)	CHARLESTON	WV	25305	38.336347	-81.612332
1900 KANAWHA BLVD E @ (BLDG 6)	CHARLESTON	WV	25305	38.337853	-81.610197
1900 KANAWHA BLVD E @ (BLDG 9)	CHARLESTON	WV	25305	38.337763	-81.614044
1900 SCHOOL ST	CHARLESTON	WV	25387	38.3802	-81.662321
2 PLAYERS CLUB DR	CHARLESTON	WV	25311	38.339786	-81.601519
2 PORT AMHERST DR	CHARLESTON	WV	25311	38.309809	-81.556963
200 CAPITOL ST	CHARLESTON	WV	25301	38.3502	-81.634575
200 HOTEL CIR	CHARLESTON	WV	25311	38.354721	-81.603058
200 TRACY WAY	CHARLESTON	WV	25311	38.357999	-81.599659
2000 DEITRICK BLVD	CHARLESTON	WV	25311	38.351372	-81.604949
201 PENNSYLVANIA AVE	CHARLESTON	WV	25302	38.358007	-81.645639
209 CAPITOL ST	CHARLESTON	WV	25301	38.3502	-81.634575
213 HALE ST	CHARLESTON	WV	25301	38.349675	-81.633607
219 MACCORKLE AVE SW	CHARLESTON	WV	25303	38.368739	-81.698504
222 CAPITOL ST	CHARLESTON	WV	25301	38.350266	-81.634304
223 CAPITOL ST	CHARLESTON	WV	25301	38.3505	-81.634392
227 CAPITOL ST	CHARLESTON	WV	25301	38.350577	-81.633842
2300 MACCORKLE AVE SE	CHARLESTON	WV	25304	38.332311	-81.61791
231 CAPITOL ST	CHARLESTON	WV	25301	38.350577	-81.633842
233 VIRGINIA ST E	CHARLESTON	WV	25301	38.353054	-81.640556
24 MACCORKLE AVE SW	CHARLESTON	WV	25303	38.362587	-81.713673
2401 SISSONVILLE DR	CHARLESTON	WV	25312	38.384348	-81.657881
2402 MOUNTAINEER BLVD	CHARLESTON	WV	25309	38.320557	-81.71611
2800 7TH AVE	CHARLESTON	WV	25312	38.377024	-81.679969
30 CAPITOL ST	CHARLESTON	WV	25301	38.348943	-81.636507
300 56TH ST SE	CHARLESTON	WV	25304	38.314657	-81.569211
300 CAPITOL ST	CHARLESTON	WV	25301	38.351112	-81.632774
300 COURT ST	CHARLESTON	WV	25301	38.353054	-81.635277
300 SUMMERS ST	CHARLESTON	WV	25301	38.351935	-81.633429
3001 CHESTERFIELD AVE	CHARLESTON	WV	25304	38.327778	-81.607224
3004 CHESTERFIELD AVE	CHARLESTON	WV	25304	38.328159	-81.607355
3100 MACCORKLE AVE SE	CHARLESTON	WV	25303	38.365923	-81.704723
3110 MACCORKLE AVE SE	CHARLESTON	WV	25304	38.328718	-81.603177
313 MACCORKLE AVE SW	CHARLESTON	WV	25303	38.369902	-81.696997
3200 MACCORKLE AVE SE	CHARLESTON	WV	25304	38.367429	-81.70147
322 70TH ST SE	CHARLESTON	WV	25304	38.295286	-81.566188
331 LAIDLEY ST	CHARLESTON	WV	25301	38.353283	-81.632755
331 SOUTHRIDGE BLVD	CHARLESTON	WV	25309	38.318993	-81.715619
3310 PIEDMONT RD	CHARLESTON	WV	25306	38.318259	-81.562014
333 LAIDLEY ST	CHARLESTON	WV	25301	38.352222	-81.633888
350 CAPITOL ST	CHARLESTON	WV	25301	38.351085	-81.632699
350 QUARRIER ST	CHARLESTON	WV	25301	38.352973	-81.63866

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3701 MACCORKLE AVE SE	CHARLESTON	WV	25304	38.327825	-81.594606
400 PARKWAY RD	CHARLESTON	WV	25309	38.313671	-81.719121
400 QUARRIER ST	CHARLESTON	WV	25301	38.352096	-81.637599
400 TRACY WAY	CHARLESTON	WV	25311	38.357999	-81.599659
400 WASHINGTON ST E	CHARLESTON	WV	25301	38.355206	-81.63576
4004 MACCORKLE AVE SE	CHARLESTON	WV	25304	38.32677	-81.590196
4010 MACCORKLE AVE SE	CHARLESTON	WV	25304	38.326382	-81.590052
405 CAPITOL ST	CHARLESTON	WV	25301	38.351453	-81.631882
406 MACCORKLE AVE SE	CHARLESTON	WV	25314	38.34696	-81.63883
4430 KANAWHA TPKE	CHARLESTON	WV	25309	38.351532	-81.723458
450 SILVER MAPLE RDG	CHARLESTON	WV	25306	38.323888	-81.566043
4510 PENNSYLVANIA AVE	CHARLESTON	WV	25302	38.405972	-81.539295
4701 MACCORKLE AVE SE	CHARLESTON	WV	25304	38.321074	-81.581069
4812 MACCORKLE AVE SW	CHARLESTON	WV	25309	38.354694	-81.730599
4916 KANAWHA BLVD E	CHARLESTON	WV	25306	38.287681	-81.56073
5 DUDLEY FARMS LN	CHARLESTON	WV	25309	38.32916	-81.711601
500 LEE ST E	CHARLESTON	WV	25301	38.352834	-81.634972
500 QUARRIER ST	CHARLESTON	WV	25301	38.351564	-81.636988
501 MORRIS ST	CHARLESTON	WV	25301	38.3475	-81.625557
501 VIRGINIA ST E	CHARLESTON	WV	25301	38.349998	-81.633331
502 EAGLE MOUNTAIN RD	CHARLESTON	WV	25311	38.365234	-81.591913
5088 WASHINGTON ST W	CHARLESTON	WV	25313	38.415554	-81.776108
511 MORRIS ST	CHARLESTON	WV	25301	38.348229	-81.626133
5430 MACCORKLE AVE SE	CHARLESTON	WV	25304	38.315753	-81.571625
5707 MACCORKLE AVE SE	CHARLESTON	WV	25304	38.312896	-81.567585
600 CAPITOL ST	CHARLESTON	WV	25375	38.352688	-81.629158
600 QUARRIER ST	CHARLESTON	WV	25301	38.350886	-81.636227
601 BROOKS ST	CHARLESTON	WV	25301	38.349468	-81.626768
601 MORRIS ST	CHARLESTON	WV	25301	38.34802	-81.625022
602 E VIRGINIA ST	CHARLESTON	WV	25301	38.349998	-81.637222
608 TENNESSEE AVE	CHARLESTON	WV	25302	38.360602	-81.641866
614 NEW GOFF MOUNTAIN RD	CHARLESTON	WV	25313	38.396774	-81.783642
620 VIRGINIA ST E	CHARLESTON	WV	25301	38.350225	-81.637167
6607 MACCORKLE AVE SE	CHARLESTON	WV	25304	38.299159	-81.565040
7 PLAYERS CLUB DR	CHARLESTON	WV	25311	38.339786	-81.601519
700 VIRGINIA ST E	CHARLESTON	WV	25301	38.349595	-81.636364
707 VIRGINIA ST E	CHARLESTON	WV	25301	38.349595	-81.636364
746 MYRTLE RD	CHARLESTON	WV	25314	38.345744	-81.642778
800 PENNSYLVANIA AVE	CHARLESTON	WV	25302	38.359815	-81.636885
900 LEE ST E	CHARLESTON	WV	25301	38.350277	-81.633057
900 VIRGINIA ST E	CHARLESTON	WV	25301	38.348589	-81.634966
901 QUARRIER ST	CHARLESTON	WV	25301	38.349127	-81.634056
908 BULLITT ST	CHARLESTON	WV	25301	38.356775	-81.629764
922 QUARRIER ST	CHARLESTON	WV	25301	38.348889	-81.633611
95 MACCORKLE AVE SW	CHARLESTON	WV	25303	38.364695	-81.707152
950 KANAWHA BLVD E	CHARLESTON	WV	25301	38.347357	-81.635782
1200 GREENBRIER ST	CHARLESTON	WV	25311	38.356826	-81.595925

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211 LEON SULLIVAN WAY	CHARLESTON	WV	25301	38.348189	-81.631431
500 SUMMERS ST	CHARLESTON	WV	25301	38.352936	-81.631197
100 ANGLER PT	CHARLESTON	WV	25302	38.39639028	-81.59089306
100 NEWHOUSE DR	CHARLESTON	WV	25302	38.376475	-81.604875
100 SQUEAKS RD	CHARLESTON	WV	25312	38.53996	-81.732567
100 YEAGER PT	CHARLESTON	WV	25302	38.35718694	-81.59380972
1018 KANAWHA BLVD E	CHARLESTON	WV	25301	38.361946	-81.649445
110 OAKWOOD RD	CHARLESTON	WV	25314	38.333595	-81.650077
1319 LEE ST E	CHARLESTON	WV	25301	38.344804	-81.626707
1546 KANAWHA BLVD E	CHARLESTON	WV	25311	38.3386	-81.621892
1548 CLARK RD STE A	CHARLESTON	WV	25314	38.336113	-81.656387
1562 GARFIELD ST	CHARLESTON	WV	25312	38.37579	-81.65943
1862 GREENBRIER ST	CHARLESTON	WV	25311	38.372993	-81.573748
201 99TH ST	CHARLESTON	WV	25314	38.24367	-81.563818
25 COURTNEY DR	CHARLESTON	WV	25304	38.32466	-81.594815
3299 NEWHOUSE DR	CHARLESTON	WV	25302	38.400111	-81.614328
3324 PIEDMONT RD	CHARLESTON	WV	25306	38.317621	-81.561137
4704 BIG TYLER RD	CHARLESTON	WV	25313	38.402775	-81.72655
504 BEAR PT	CHARLESTON	WV	25302	38.361944	-81.641389
531 VELTRI WAY	CHARLESTON	WV	25302	38.41827	-81.532915
609 GREEN RD	CHARLESTON	WV	25309	38.326944	-81.719597
824 CENTRAL AVE	CHARLESTON	WV	25303	38.364166	-81.65361
900 PENNSYLVANIA AVE	CHARLESTON	WV	25302	38.359722	-81.633614
931 SCENIC DR	CHARLESTON	WV	25311	38.350437	-81.606236
201 CREEL AVE	CHARLESTON	WV	25314	38.348566	-81.642053
301 VIRGINIA ST E	CHARLESTON	WV	25301	38.352112	-81.639474
816 LEE ST E	CHARLESTON	WV	25301	38.350556	-81.633056
1831 RADY CT	RICHMOND	VA	23222	37.562778	-77.415833
2501 GOODES BRIDGE RD	RICHMOND	VA	23224	37.471863	-77.520937
703 E GRACE ST	RICHMOND	VA	23219	37.540493	-77.435866
10710 MIDLOTHIAN TPKE	RICHMOND	VA	23235	37.506668	-77.592499
108 8TH ST	RICHMOND	VA	23219	37.540039	-77.435999
1100 BOULDERS PKWY	RICHMOND	VA	23221	37.508667	-77.532019
11011 W BROAD ST	RICHMOND	VA	23060	37.647355	-77.587522
11013 W BROAD ST	RICHMOND	VA	23060	37.647398	-77.587841
1115 BOULDERS PKWY	RICHMOND	VA	23225	37.512939	-77.530023
12445 PATTERSON AVE	RICHMOND	VA	23238	37.598762	-77.643249
1250 E MARSHALL ST	RICHMOND	VA	23298	37.539872	-77.42977
1308 SHERWOOD AVE	RICHMOND	VA	23220	37.570902	-77.453265
1401 JOHNSTON WILLIS DR	RICHMOND	VA	23235	37.509724	-77.59639
1506 STAPLES MILL RD	RICHMOND	VA	23230	37.578608	-77.496231
1508 WILLOW LAWN DR	RICHMOND	VA	23226	37.579445	-77.500832
1601 WILLOW LAWN DR	RICHMOND	VA	23230	37.582807	-77.498769
1602 SKIPWITH RD	RICHMOND	VA	23229	37.602779	-77.537781
1630 WILKES RIDGE PKWY	RICHMOND	VA	23233	37.661415	-77.650226
1651 E PARHAM RD	RICHMOND	VA	23228	37.638477	-77.477590
1700 BAYBERRY CT	RICHMOND	VA	23226	37.604721	-77.529167

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1800 BAYBERRY CT	RICHMOND	VA	23226	37.607844	-77.532706
2075 CHARLES CITY RD	RICHMOND	VA	23231	37.506955	-77.368307
23 S 13TH ST	RICHMOND	VA	23219	37.535527	-77.433658
2800 SPROUSE DR	RICHMOND	VA	23231	37.49612	-77.345428
2924 BROOK RD	RICHMOND	VA	23220	37.571271	-77.449262
2924 EMERYWOOD PKWY	RICHMOND	VA	23294	37.609165	-77.522781
3 GATEWAY RD	RICHMOND	VA	23226	37.577267	-77.535838
3001 N BOULEVARD	RICHMOND	VA	23230	37.571979	-77.465024
3107 LANVALE AVE	RICHMOND	VA	23230	37.575095	-77.466735
3900 WESTERRE PKWY	RICHMOND	VA	23233	37.644581	-77.576266
4319 OLD BROOK RD	RICHMOND	VA	23227	37.594952	-77.447850
4915 RADFORD AVE	RICHMOND	VA	23230	37.580814	-77.495301
50 PEAR ST	RICHMOND	VA	23223	37.527023	-77.419323
5601 W BROAD ST	RICHMOND	VA	23230	37.588490	-77.502670
5875 BREMO RD	RICHMOND	VA	23226	37.583889	-77.513054
5901 W BROAD ST	RICHMOND	VA	23230	37.591671	-77.505838
600 E BROAD ST	RICHMOND	VA	23219	37.541668	-77.436111
600 E LABURNUM AVE (@ BLDG ADMIN)	RICHMOND	VA	23222	37.585561	-77.419318
601 SOUTHLAKE BLVD	RICHMOND	VA	23236	37.501035	-77.596866
626 E BROAD ST	RICHMOND	VA	23219	37.542213	-77.436145
6604 W BROAD ST	RICHMOND	VA	23501	37.601283	-77.514726
6606 W BROAD ST	RICHMOND	VA	23230	37.601283	-77.514726
7300 BEAUFONT SPRINGS DR	RICHMOND	VA	23225	37.510834	-77.529999
7401 BEAUFONT SPRINGS DR	RICHMOND	VA	23225	37.511791	-77.531117
7500 BOULDER VIEW DR	RICHMOND	VA	23225	37.514862	-77.533525
7700 MIDLOTHIAN TPKE	RICHMOND	VA	23235	37.499241	-77.537754
7800 CAROUSEL LN	RICHMOND	VA	23294	37.629334	-77.5306
7814 CAROUSEL LN	RICHMOND	VA	23294	37.629334	-77.530600
820 SOUTHLAKE BLVD	RICHMOND	VA	23236	37.504044	-77.597798
8250 W BROAD ST	RICHMOND	VA	23294	37.630658	-77.536084
8301 W BROAD ST	RICHMOND	VA	23294	37.631340	-77.537450
8550 MAGELLAN PKWY	RICHMOND	VA	23227	37.646351	-77.434024
8570 MAGELLAN PKWY	RICHMOND	VA	23227	37.638332	-77.447777
8700 STONY POINT PKWY	RICHMOND	VA	23235	37.550787	-77.56747
8720 STONY POINT PKWY	RICHMOND	VA	23235	37.552018	-77.564912
9000 STONY POINT PKWY	RICHMOND	VA	23235	37.552664	-77.566227
901 E BYRD ST	RICHMOND	VA	23219	37.535434	-77.438393
9020 STONY POINT PKWY	RICHMOND	VA	23235	37.552664	-77.566227
909 E MAIN ST	RICHMOND	VA	23219	37.537498	-77.435837
9109 STONY POINT DR	RICHMOND	VA	23235	37.54806	-77.566654
925 W BROAD ST	RICHMOND	VA	23220	37.550477	-77.450125
9930 INDEPENDENCE PARK DR	RICHMOND	VA	23233	37.637911	-77.569787
SE CORNER OF E MAIN ST & S 9TH ST	RICHMOND	VA	23219	37.538111	-77.436306
100 WESTGATE PKWY	RICHMOND	VA	23233	37.650112	-77.622423
10525 W HUGUENOT RD	RICHMOND	VA	23235	37.533287	-77.590760
10700 ACADEMY DR	RICHMOND	VA	23236	37.462356	-77.596812
1100 JEFFERSON DAVIS HWY	RICHMOND	VA	23224	37.504766	-77.448417

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11300 PATTERSON AVE	RICHMOND	VA	23238	37.597822	-77.623493
116 E FRANKLIN ST	RICHMOND	VA	23219	37.543113	-77.442252
1160 S PROVIDENCE RD	RICHMOND	VA	23236	37.481465	-77.554288
11910 W BROAD ST	RICHMOND	VA	23233	37.659180	-77.623828
1207 SCHOOL ST	RICHMOND	VA	23220	37.558334	-77.448059
1604 E BROAD ST	RICHMOND	VA	23219	37.536683	-77.4271
1623 THREE CHOPT RD	RICHMOND	VA	23233	37.673421	-77.663619
1650 DARBYTOWN RD	RICHMOND	VA	23231	37.509167	-77.378334
1720 DUMBARTON RD	RICHMOND	VA	23228	37.604443	-77.463333
1810 MAGNOLIA ST	RICHMOND	VA	23222	37.56447	-77.414345
1810 W MAIN ST	RICHMOND	VA	23220	37.548617	-77.46377
1840 SEMMES AVE	RICHMOND	VA	23225	37.522388	-77.453143
1900 CHATSWORTH AVE	RICHMOND	VA	23235	37.52256	-77.563356
1955 PORTUGEE RD	RICHMOND	VA	23150	37.487024	-77.277686
2100 WESTWOOD AVE	RICHMOND	VA	23230	37.57796	-77.474071
23 SESAME ST	RICHMOND	VA	23235	37.515057	-77.602019
2324 PUMP RD	RICHMOND	VA	23233	37.625	-77.60833
239 COLLEGE RD	RICHMOND	VA	23173	37.581183	-77.540246
2400 OWNBY LN	RICHMOND	VA	23220	37.564438	-77.457254
2432 STRATFORD RD	RICHMOND	VA	23225	37.531516	-77.546668
2510 WILLIS RD	RICHMOND	VA	23237	37.400370	-77.429359
2520 E BROAD ST	RICHMOND	VA	23223	37.531365	-77.418373
2600 N PARHAM RD	RICHMOND	VA	23294	37.625083	-77.552283
2621 GROVE AVE	RICHMOND	VA	23220	37.554368	-77.472676
2810 LAMBERTS AVE	RICHMOND	VA	23234	37.476389	-77.459722
2939 SPACE RD	RICHMOND	VA	23234	37.458611	-77.455833
301 VIRGINIA ST	RICHMOND	VA	23219	37.532826	-77.434061
3358 NINE MILE RD	RICHMOND	VA	23223	37.544445	-77.394447
3425 PUMP RD	RICHMOND	VA	23233	37.567136	-77.461793
3600 OLD COX RD	RICHMOND	VA	23233	37.642457	-77.582445
3600 W BROAD ST	RICHMOND	VA	23230	37.569058	-77.47716
3800 MECHANICSVILLE TPKE	RICHMOND	VA	23223	37.578084	-77.395419
3906 OLD HOPKINS RD	RICHMOND	VA	23234	37.46676	-77.468482
401 MCCLOY ST	RICHMOND	VA	23221	37.550847	-77.483267
4100 BENTON AVE	RICHMOND	VA	23222	37.582754	-77.411502
4200 CARY STREET RD	RICHMOND	VA	23221	37.559722	-77.493056
443 BELT BLVD	RICHMOND	VA	23224	37.503611	-77.470278
5100 MONUMENT AVE	RICHMOND	VA	23230	37.578546	-77.501178
520 W FRANKLIN ST	RICHMOND	VA	23220	37.54676	-77.448268
530 HYLTON RD	RICHMOND	VA	23238	37.595645	-77.64483
5309 NEWTON RD	RICHMOND	VA	23231	37.511944	-77.407222
5450 LEWIS RD	RICHMOND	VA	23150	37.513611	-77.341667
5504 PRIDE RD	RICHMOND	VA	23224	37.502823	-77.498895
5621 CARY STREET RD	RICHMOND	VA	23226	37.569221	-77.521711
5909 W BROAD ST	RICHMOND	VA	23221	37.591671	-77.505838
6000 WILKINSON RD	RICHMOND	VA	23227	37.618463	-77.425582
655 HUGUENOT LN	RICHMOND	VA	23233	37.601112	-77.649719

Lumos On-Net Building List - Charleston and Richmond - June 25, 2018

6550 HULL ST RD	RICHMOND	VA	23225	37.480562	-77.515353
6900 HULL STREET RD	RICHMOND	VA	23224	37.47409	-77.523677
700 E FRANKLIN ST	RICHMOND	VA	23221	37.539902	-77.436879
701 GERMAN SCHOOL RD	RICHMOND	VA	23225	37.513338	-77.508366
7101 JAHNKE RD	RICHMOND	VA	23225	37.515835	-77.525833
7150 WILSON RD	RICHMOND	VA	23231	37.469584	-77.362932
716 E 7TH ST	RICHMOND	VA	23224	37.514721	-77.436386
7330 FOREST HILL AVE	RICHMOND	VA	23225	37.536945	-77.532776
7420 IRON BRIDGE RD	RICHMOND	VA	23234	37.409366	-77.503017
7500 W BROAD ST	RICHMOND	VA	23228	37.616345	-77.522347
7821 WALMSLEY BLVD	RICHMOND	VA	23235	37.460278	-77.537224
8002 DISCOVERY DR	RICHMOND	VA	23221	37.603764	-77.545008
8006 MIDLOTHIAN TPKE	RICHMOND	VA	23235	37.498111	-77.54302
8507 JESSE SENIOR DR	RICHMOND	VA	23223	37.581101	-77.520749
8794 RIVER RD	RICHMOND	VA	23229	37.57161	-77.576954
9105 STONY POINT DR	RICHMOND	VA	23235	37.548207	-77.564981
9300 HOPKINS RD	RICHMOND	VA	23237	37.395162	-77.457919
9310 THREE CHOPT RD	RICHMOND	VA	23229	37.617498	-77.569036
9515 W BROAD ST	RICHMOND	VA	23294	37.640155	-77.55931
9717 VARINA RD	RICHMOND	VA	23231	37.398335	-77.342499
9901 MIDLOTHIAN TPKE	RICHMOND	VA	23235	37.5048	-77.578382
I 95 S & I 295 S	RICHMOND	VA	23227	37.657446	-77.450692
1001 OLIVER HILL WAY	RICHMOND	VA	23225	37.541764	-77.424258
701 E CARY ST	RICHMOND	VA	23219	37.538155	-77.438504
500 HIOAKS RD	RICHMOND	VA	23225	37.510922	-77.524867

## **EXHIBIT 4**

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**From:** Kai Thompson <[Kai.Thompson@usac.org](mailto:Kai.Thompson@usac.org)>  
**Sent:** Wednesday, March 13, 2019 11:57 AM  
**To:** Jason Whipkey <[jason.whipkey@cbhealthwv.org](mailto:jason.whipkey@cbhealthwv.org)>  
**Subject:** RE: Urban Rate Source Information  
**Importance:** High

Hi Jason,

Thanks for your question. The Lumos documentation is not considered “publicly available” because you had to contact the provider in order to obtain the rates, as a potential customer might do for a price quote, rather than the rates being easily searchable online or found in a public document like a tariff. The link below contains some information that may be helpful in understanding the urban rate:

[https://www.usac.org/\\_res/documents/rhc/pdf/handouts/TelecomRuralUrbanRateInfo.pdf](https://www.usac.org/_res/documents/rhc/pdf/handouts/TelecomRuralUrbanRateInfo.pdf)

In your case however, the second rate shown in your urban rate supporting pdf that was taken from the Frontier tariff is acceptable. If you give your permission, I can use that as the urban rate on your FRNs and adjust the submitted form accordingly.

Best,

**Kai Thompson**

Rural Health Care Program

USAC

[rhc-review@usac.org](mailto:rhc-review@usac.org) | [Health Care Connect Fund](#)

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**From:** Jason Whipkey [<mailto:jason.whipkey@cbhealthwv.org>]  
**Sent:** Wednesday, March 13, 2019 11:46 AM  
**To:** Kai Thompson  
**Subject:** Urban Rate Source Information

Hello Kai,

I am currently reviewing your response to our urban rate documentation. Can you provide more guidance on what is considered publicly available? The Lumos documentation we provided, while not posted on their website, were readily available by contacting the provider. The FCC guidance says “Urban rate documentation may include tariff pages, contracts, signed letters on a service provider’s letterhead, rate pricing information from a service provider’s website, or similar documentation showing how the urban rate was obtained.”



**Jason Whipkey** | Chief Information Officer | Certified Application Counselor  
**Clay-Battelle Health Services Association** | Phone: 304.432.8211 x 227 | Fax: 304.432.8213  
5861 Mason Dixon Highway | PO Box 72 | Blacksburg, WV 26521  
Website: [cbhealthwv.org](http://cbhealthwv.org) | Email: [jason.whipkey@cbhealthwv.org](mailto:jason.whipkey@cbhealthwv.org)

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## **EXHIBIT 5**

**From:** David Wagner <[david@pemfilings.com](mailto:david@pemfilings.com)>  
**Sent:** Wednesday, February 27, 2019 09:29 AM  
**To:** Funding  
**Cc:** [cnetterville@fhsm.org](mailto:cnetterville@fhsm.org); Debbie Willingham; Tara Nordstrom  
**Subject:** Field - Telecom Urban Rate 2018 FW: Action Required - RHC Telecommunications Program - Submit Requested Information - FCC Form 466 HCP # 39655, FRN 1829546

Hi Telequality: USAC Info request in portal needing response:

Information Request

Support Documentation

**Request Type**  
Urban Rate Documentation

**Deadline**  
3/12/2019

**Requested information.**  
FRN: 1829546 The documentation attached to support the HCP's urban rate entered on Line 41 of the FCC Form 466 is inadequate. The funding request cannot be processed without adequate documentation of the urban rate. The document that was provided from Nitel does not meet the standard of being publicly available. Please either indicate if you would like to use the documentation that was originally submitted with the FCC Form 466, or if you would like to provide new documentation to justify the urban rate. Please respond to this Information Request as soon as possible with adequate documentation of the urban rate. The urban rate must resemble the rural rate as closely as possible in terms of duration of service agreement, circuit type, bandwidth, and rate elements associated with the circuit. The urban rate must be in use in an urban area in the HCP's state. Valid urban rate documentation includes a tariff submitted with a state or federal agency, or a service provider rate sheet that is available to the public on their website. A response is required. Responses not received within 14 calendar days will result in a denial of this funding request. For questions or assistance about this information request, contact Seth Toplin at (202) 909-4842.

**Use this space to provide pertinent information and documents being uploaded.**

Thanks, David

David Wagner | PEM Filings | 203-527-5930 (ph) | 800-574-3869 (fax)  
[david@PemFilings.com](mailto:david@PemFilings.com)

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**From:** [rhc-assist@usac.org](mailto:rhc-assist@usac.org) <[rhc-assist@usac.org](mailto:rhc-assist@usac.org)>

**Sent:** Tuesday, February 26, 2019 5:50 PM

**To:** [cnetterville@fhsms.org](mailto:cnetterville@fhsms.org); David Wagner <[david@pemfilings.com](mailto:david@pemfilings.com)>; [dwillingham@fhsms.org](mailto:dwillingham@fhsms.org)

**Subject:** Action Required - RHC Telecommunications Program - Submit Requested Information  
- FCC Form 466 HCP # 39655, FRN 1829546

Date:	26-Feb-2019
Program:	Telecommunications Program
Funding Year:	2018
Health Care Provider (HCP) Name:	FMCH Gloster Clinic
HCP Number:	39655
Funding Request Number (FRN):	1829546
FCC Form 465 Application Number:	43179894

The Universal Service Administrative Company (USAC)'s Rural Health Care (RHC) Program received the FCC Form 466 submitted by the HCP referenced above. However, additional information is required to complete the review of this form. The information requested must be submitted to USAC within two weeks of the date of this notification. Failure to respond will delay processing of the funding request, and could result in a denial of the funding request.

### **Next Steps**

To view and respond to the request for information, log into the RHC My Portal (<https://forms.universalservice.org/usaclogin/login.asp>), go to Information Requested on the My Documents tab, and click on the hyperlink under the "Request" column. Click on "Submit Response" to submit the information requested. Any account holder can respond to an Information Request. Once the request has been completed, the request will change to status "Replied" and the information provided will be saved to the My Documents folder.

### **For More Information**

Please do not reply directly to this email, as emails to this account will not be delivered to the RHC Program team. For questions or assistance, contact the Rural Health Care Program Help Desk at (800) 453-1546 or by email at [rhc-assist@usac.org](mailto:rhc-assist@usac.org).

For more information about the Telecommunications Program application process, refer to

the Telecom Program Getting Started web page at

<http://www.usac.org/rhc/telecommunications/process-overview/default.aspx/>.

The primary account holder will be copied on this and all correspondence from USAC related to this HCP.